



**ZACHARY W. CARTER**  
*Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

**JUSTIN REITER**  
*Assistant Corporation Counsel*  
Labor and Employment Law Division  
Tel: (212) 356-3580  
jreiter@law.nyc.gov

January 19, 2018

**VIA ECF:**

Honorable Sanket J. Bulsara  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Karen Wald v. The Department of Education of the City of New York  
Civil Action No.: 17-CV-3560(WFK)(SJB)

Dear Judge Bulsara:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for the Defendant Board of Education of the City School District of The City of New York (BOE”) (also known as and sued herein as the “The Department of Education of the City of New York”) in the above-referenced action. I write on behalf of both parties in response to Your Honor’s December 1, 2017 Order directing the parties to submit a joint status report letter on or before January 19, 2018. Below, please find a summary of the parties’ discovery progress.

The parties have exchanged initial disclosures. On September 28, 2017, Defendant served its First Combined Set of Interrogatories and Demand for the Production of Documents. Similarly, Plaintiff served their First Set of Interrogatories and First Document Production Request on September 28, 2017. On December 5, 2017, Defendant served its Responses and Objections to Plaintiff’s First Set of Interrogatories and Document Requests. On January 8, 2018 Plaintiff served her Answers to Defendant’s Interrogatories and Document Production, and Defendant received these responses on January 11, 2018. Finally, Defendant has scheduled Plaintiff’s deposition on February 2, 2018, while Plaintiff has scheduled the deposition of Superintendent Rose-Marie Mills on February 5, 2018.

While fact discovery is set to close on February 7, 2018, Defendant is still seeking certain documents and releases that have not yet been turned over by Plaintiff, and Plaintiff is awaiting certain discovery as well. While Defendant plans on discussing these concerns with Plaintiff and hopes that the issue can be resolved prior to the status conference set on January 26, 2018, in the event that the dispute is not resolved, the parties agree to notify the Court as soon as possible.

Respectfully submitted,

/s/

Justin Reiter, Esq.

Assistant Corporation Counsel

cc: Natalia Kapitonova (By ECF)  
The Law Offices of Stewart Lee Karlin, P.C.  
Attorneys for Plaintiff  
111 John Street. 22<sup>nd</sup> Floor  
New York, New York 10038  
[cnk@stewartkarlin.com](mailto:cnk@stewartkarlin.com)